

Manufacturing The Future of Communications

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InterDigital®

InterDigital Communications Corporation
2200 Renaissance Boulevard/Suite 105
P.O. Box 61546
King of Prussia, PA 19406-0946
TEL: (610) 278-7800
FAX: (610) 278-6801
TELEX: 496 16 278 IDC PHA

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93-116

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FEDERAL COMM

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

December 12, 1994

**Re: Petition for Reconsideration by InterDigital
Communication Corporation of the Report and Order in
CC Docket 92-115**

Dear Mr. Caton:

Transmitted herewith are an original and 11 copies of the
Petition for Reconsideration of InterDigital Communications
Corporation in the above referenced proceeding.

If you have any questions with regard to this matter, please
do not hesitate to contact me.

Sincerely,



William A. Doyle
President

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FCC MAIL ROOM

In the Matter of)

Revision of Part 22 of the Commissions)
Rules Governing the Public Mobile Services)

CC Docket No. 92-115

Amendment of Part 22 of the Commission's)
Rules to Delete Section 22.119 and Permits)
the Concurrent Use of Transmitters in)
Common Carrier and Non-common Carrier)
Service)

CC Docket No. 94-46
RM 8367

Amendment of Part 22 of the Commission's)
Rules Pertaining to Power limits for Paging)
Stations Operating in the 931 MHz Band in)
the Public Land mobile Service)

CC Docket No. 93-116

To: the Commission

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PETITION FOR RECONSIDERATION

InterDigital Communications Company ("IDC"), pursuant to Section 1.429 of the Commission's Rules, 47 C.F.R. 1.429, hereby submits its Petition for Reconsideration of rules regarding certain technical rules regarding Basic Exchange Telecommunications Radio Service ("BETRS") adopted in the Report and Order in the above-captioned proceeding.¹ IDC requests that the Commission reconsider its ruling requiring BETRS base stations to broadcast a station identification and further, IDC requests the Commission to add the emission designator 20K0G1E as an authorized designator for BETRS.

¹ Report and Order, CC Dockets 92-115, 94-46 and 93-116, released September 9, 1994, published in the Federal Register November 17, 1994.

I BACKGROUND

IDC is a wireless technology manufacturer that has developed an advanced, spectrum efficient digital radio system currently in use providing wireless loops between telephone central offices and customer premises. The system, called the Ultraphone, is based on digital Time Division Multiple Access ("TDMA") techniques which allow multiple users simultaneously to share a single radio channel. The service is provided by telephone companies under the Commission's Basic Exchange Telecommunications Radio Service (BETRS) rules² governing radio in the local loop. BETRS is provided primarily in rural areas.

The minor rule changes requested in this reconsideration petition will reinstate BETRS rules that have governed BETRS since its inception³ nearly seven years ago. Since that time, thousands of rural customers have been provided excellent quality and affordable telephone service through the use of sophisticated digital radio BETRS systems.

II. COMMISSION RULINGS ON STATION IDENTIFICATION

In this Report and Order, the Commission added a paragraph to the new section 22.313 regarding station identification. In that paragraph, the Commission exempted BETRS subscriber stations from the station identification requirement. The rationale for

² 47 C.F.R. Section 22.600

³ See Report and Order, CC Docket No. 86-495, 3FCC Rcd 214 (1988)

the exemption is that BETRS subscriber stations use digital emissions and therefore they have no means of complying. IDC requests that the exemption extend to the base station as well as the subscriber station.

In a BETRS system the base station (called the central office terminal) is normally located at the telephone company central office. It transmits to subscribers located tens of miles from the central office. The signal transmitted is a continuous digital TDMA signal which would preclude the interruption for station identification.

Furthermore, both the central office terminal and the subscriber stations are fixed stations and are part of the telephone companies provision of telephone service. The location and identification of the base station and the subscriber stations is tied directly to known and published telephone numbers and addresses.

The original station identification section in Part 22 (22.213) contained a distinct waiver of the station identification requirement: "Provided, that the requirement for transmission of station identification is waived for fixed stations employing continuous radiation with multichannel or video transmission...."

BETRS stations, both at the base and subscriber ends, meet all of the requirements for waiver. Accordingly, request the Commission revise new section 22.313 (a) (4) to read "Stations using BETRS in the Rural Radio Service."

III. COMMISSION RULINGS ON EMISSION TYPES

In new section 22.357 (d), the Commission included a new emission designator specifically for BETRS: 20KOD7W. IDC concurs that this is a correct designator for the digital radios in use in the bulk of the BETRS systems currently deployed. However, during the type authorization process, the FCC's labs decided that 20KOG1E would more accurately fit the sophisticated BETRS digital TDMA systems deployed throughout the telephone industry. Accordingly all of the systems now in use carry the 20KOG1E designator affixed by the FCC's labs.


It would seem that either designator would be appropriate. Therefore, to preclude a mass refilling of type authorizations for existing systems, request that the Commission add the emission designator 20KOG1E to the new paragraph 22.357 (d). The cost and paperwork savings alone justify this administrative edit.

1V. CONCLUSION

The extension of telephone service in rural areas using copper wire is both expensive and in some cases impossible. BETRS has been successful in applying sophisticated digital radio to the problem of bringing telephone service to rural areas of America. The thousands of affordable, radio-based, local loops in place throughout rural America is a testimony to the use of new technology hand-in-hand with sensible regulation to solve old problems.

IDC respectfully requests that the Commission add the BETRS base station to their station identification exemption and add the new emission designator, 20KOG1E into their Part 22 rules. These changes will permit telephone companies to continue to provide high-quality and affordable radio-based local loops in their rural service areas.

Respectfully submitted,


William A. Doyle
President

InterDigital Communications Corporation
2200 Renaissance Blvd., Suite 105
King of Prussia, PA. 19406

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